

## PURPOSE

The purpose is to establish the policy and procedure for the Michigan Department of Health and Human Services (MDHHS) to establish MDHHS guidelines for the removal of Protected Health Information (PHI) from electronic media before the media are made available for reuse.

## REVISION HISTORY

Issued: 09/20/2006  
Revised: 01/01/2016  
Reviewed: 01/01/2017  
Next Review: 01/01/2018

## DEFINITIONS

**ePHI** is the acronym for Electronic Protected Health Information. It is Protected Health Information that is transmitted or maintained in electronic form

**PHI** is an acronym for Protected Health Information. It is information that can identify a person and contains health related data pertaining to that person.

**Workforce Member** means employees, volunteers and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, students, volunteers and staff from third party entities who provide service to the covered entity.

## POLICY

It is the policy of the MDHHS in conjunction with the Department of Technology, Management, and Budget (DTMB) to take reasonable and appropriate steps to control its hardware and electronic media containing sensitive information or ePHI through the entire lifecycle from initial receipt to final removal by following applicable DTMB policies and procedures. Such control includes reasonably and appropriately protecting, accounting for, properly storing, backing up and disposing of its hardware and electronic media in accordance with specific control procedures and tracking all incoming hardware and electronic media and transfers of hardware and electronic media as they are moved into, out of and within its facilities in accordance with applicable DTMB policies and procedures.

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**PROCEDURE****Division Director or Section Supervisor/Manager/Workforce Member**

Follow Department of Technology, Management, and Budget (DTMB) policies and procedures for media reuse. MDHHS media shall not be reused without following DTMB procedures. In compliance with DTMB, usable desktop equipment shall be returned to the DTMB depot operation to be reissued to other state agencies as needed or stripped down for parts. The DTMB Client Service Center can be reached at 517-241-9700 or 800-968-2644.

Temporary materials that contain ePHI or otherwise sensitive information when created shall be marked as such and the appropriate department shall establish a date for either destroying or bringing the materials under control as record documents.

**REFERENCES**

45 CFR 164.310(d)(1)

DTMB 1340.00.110.04 Secure Disposal of Installed and Removable Digital Media Standard

DTMB Information Technology Equipment Life Cycle

**CONTACT**

For additional information concerning this policy and procedure, contact the MDHHS Compliance Office at [MDHHSPrivacySecurity@michigan.gov](mailto:MDHHSPrivacySecurity@michigan.gov).